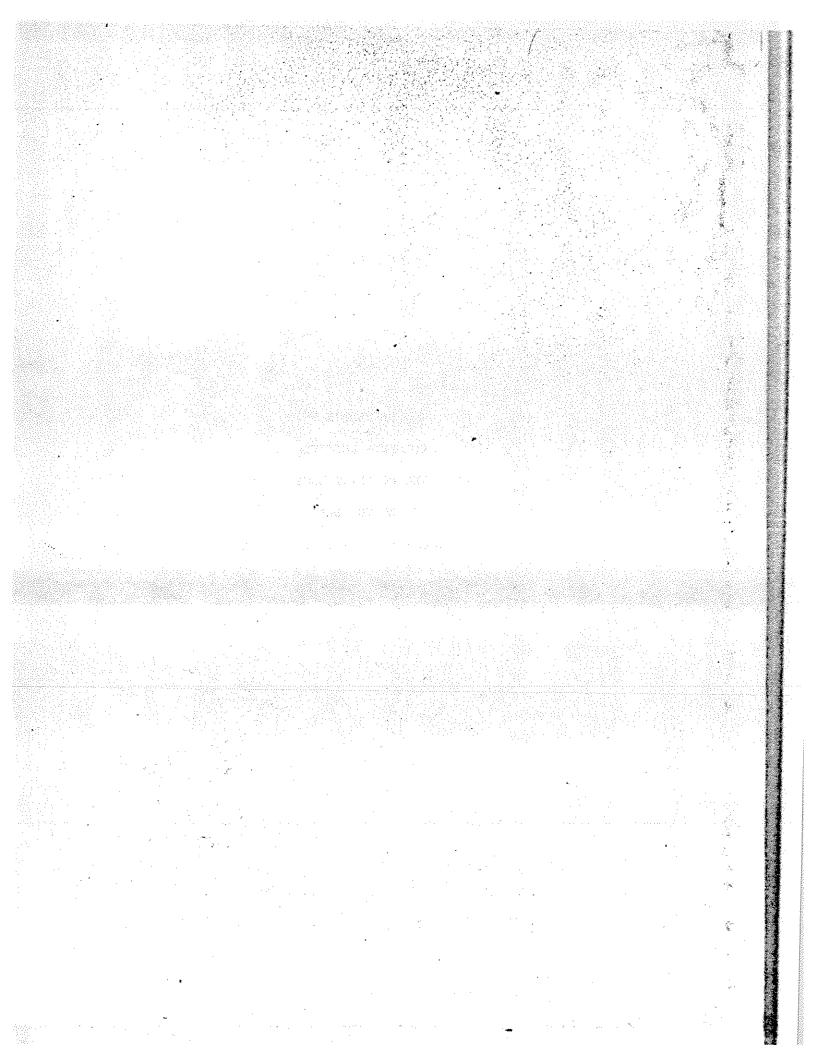
APPENDIX F

COMMENTS RECEIVED BY

THE DISTRICT ENGINEER

ON THE DRAFT

ENVIRONMENTAL IMPACT STATEMENT



UNITED STATES DEPARTMENT OF AGRICULTURE

Soil Conservation Service

State Office, P. O. Box 1208, Gaincsville, F1 22602

SUBJECT: EVT - Review of Draft Environmental Statements Date: September 3, 1974

and Assessments

TO: James L. Garland
Chief, Engineering Division
Department of the Army
P. O. Box 4970
Jacksonville, F1 32201

Re: Dade County, Florida
Beach Erosion Control Project

ACTION TAXEN 5

The Soil Conservation Service has reviewed subject statement or assessment that accompanied a transmittal dated July 19, 1974.

As the result of our review it was determined that:

We have no constructive comments to offer.

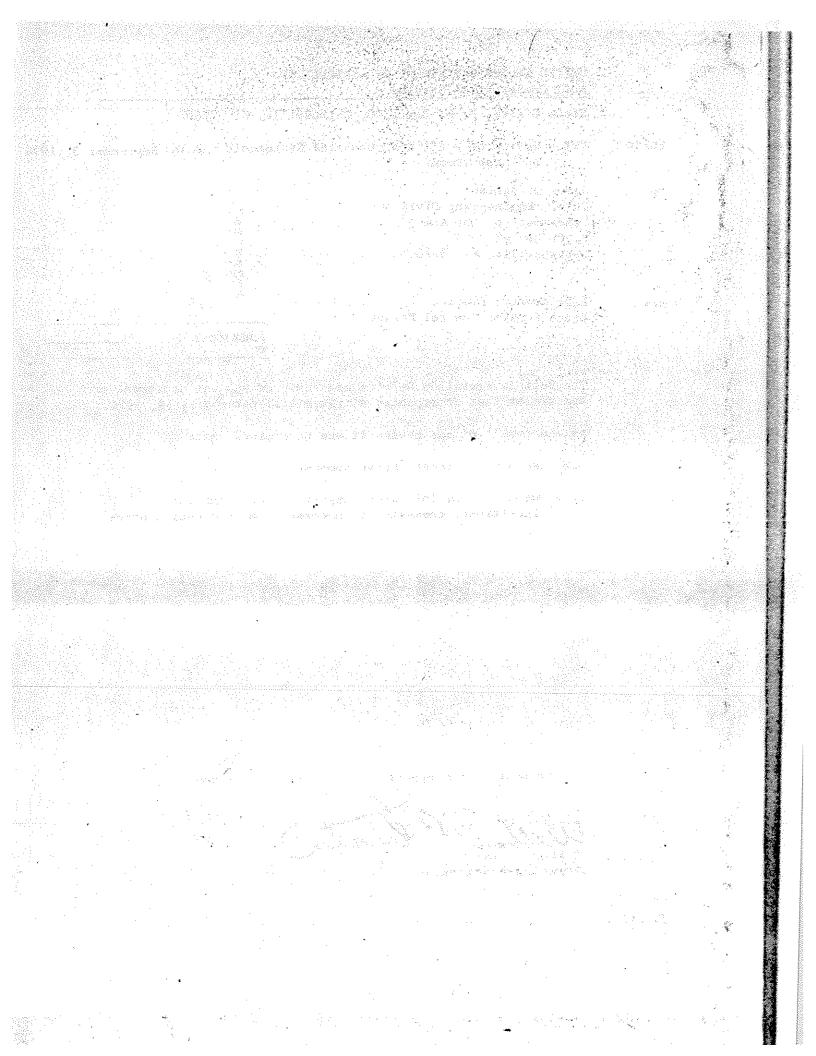
//7 We offer the following suggestions or comments: (Additional comments, if necessary, on succeeding pages)

We appreciated the opportunity to review and comment.

William E. Austin

State Conservationist

USD.:-SCS FL-EVT-1 6/26/7/



# United States Department of Agriculture FOREST SERVICE

Southeastern Area, State and Private Forestry Atlanta, Georgia 30309

8420

August 8, 1974

Mr. James L. Garland
Chief, Engineering Division
Jacksonville District
Corps of Engineers
P.O. Box 4970
LJacksonville, Florida 32201



Dear Mr. Garland:

The impact of the <u>Beach Erosion Control</u> and <u>Hurricane Protection</u>

<u>Project in Dade County, Florida</u> on forest lands and resources

will be negligible. Therefore, the Forest Service, State and

Private Forestry - Southeastern Area has no comments on the draft.

environmental statement covering this project.

KA WILLTON

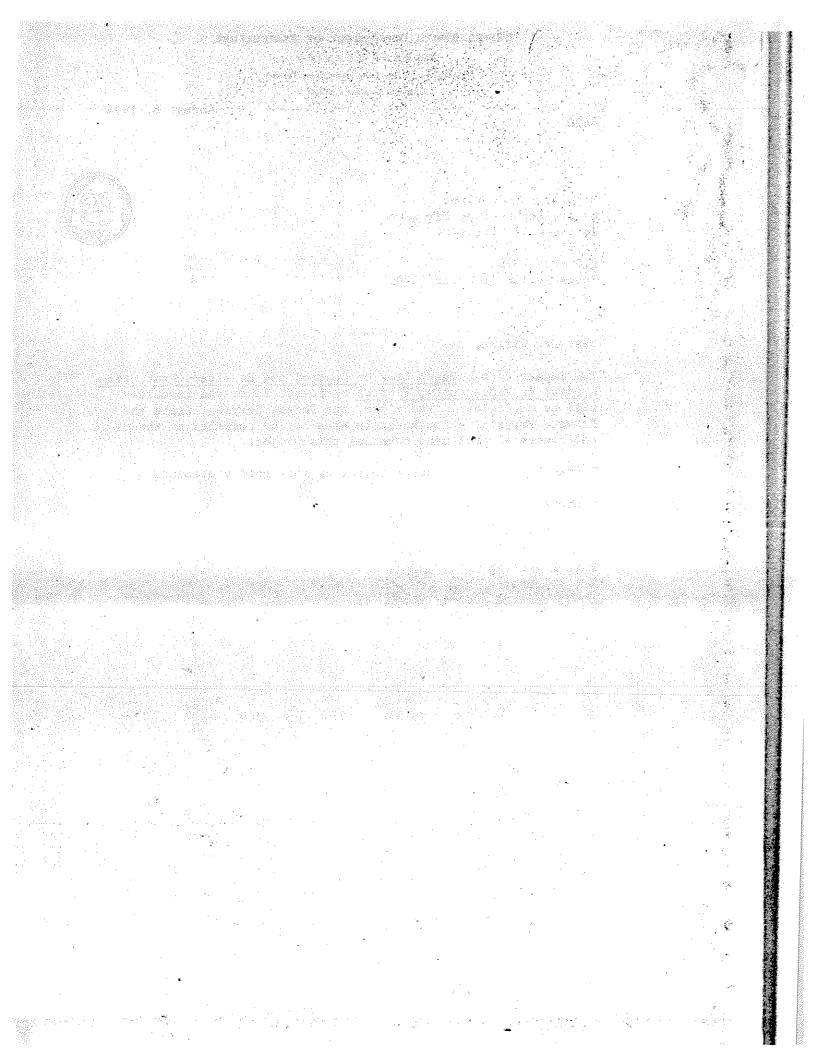
Thanks for the opportunity to review this good statement.

Sincerely,

PAUL E. BUFFAM

Group Leader

Environmental Quality Evaluation





UNITED STATES DEPARTMENT OF COMMERCE The Assistant Secretary for Science and Technolog Washington, D.C. 20230

September 19, 1974

w

James L. Garland
Chief, Engineering Division
U.S. Department of the Army
Jacksonville District, Corps
of Engineers
P. O. Box 4970
Jacksonville, Florida 32201

315

Dear Mr. Garland:

The draft environmental impact statement for "Beach Erosion Control and Hurricane Protection Project - Dade County, Florida," which accompanied your letter of July 19, 1974, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

#### 1.00 Project description

Page 1. Inclusion of the estimated width of fill needed to form "natural seaward slopes" below the 70 foot width of the dune and berm would increase the informational content of the statement. Plans to establish dune vegetation should also be considered. Beach plantings have had some success in other areas and have been included as integral parts of other nourishment programs. 1/

#### 1.02 Methods and source of materials

<u>Page 3</u>. The proposed offshore borrow sites should be identified and described in greater detail. Minimum data should include:

- a.) location of reefs,
- b.) isopachs of available sand, and
- c.) quantity and sedimentary characteristics of available sand.

The information on isopachs is available from the Corps of Engineers.

This section would also be enhanced by including a description of the type and alignment of cuts (i.e., whether they will be deep pits or shallow trenches).

# 2.00 Environmental setting without the project Additional background information

The statement does not mention the contribution of rising sea level to the serious problem of beach erosion. According to the National Ocean Survey's most up-to-date measurements and calculations, sea level has been rising relative to the land at an average rate (least squares on annual means) of 2.50 mm/yr (+ 0.29 mm/yr) from 1932 through 1972 at Miami.

Bathymetry information available from the National Oceanic and Atmospheric Administration - National Ocean Survey (NOAA-NOS) should be included.

Also, a five-month program of current measurements and other physical oceanographic measurements just seaward of Miami Beach within the project area has just been completed. This is a joint effort by NOAA's Atlantic Oceanographic and Meteorological Laboratories (Miami), the Rosenstiel School of Marine and Atmospheric Science (University of Miami), and Nova University (Ft. Lauderdale). There were eight anchored current meter buoy stations in water depths between 20 and 100 feet with two or three meters at the deeper stations and one at the shallower ones. Meters were regularly replaced by divers so that continuous records for periods up to five months are available. The field phase was completed in early August of 1974, and the data are still being reduced for analysis. is urged that the Corps of Engineers review the status of this project and include in their statement such relevant information as is then available.

#### 2.04 <u>Hurricanes</u>

<u>Page 7.</u> Considering that the project is proposed as a hurricane control measure, we suggest that the statement evaluate the success that beach renourishment programs have had elsewhere in preventing or diminishing damage from hurricanes.

Figure 1, for example, shows severe damage to the Bal Harbour beaches less than one year after beach nourishment was completed.

#### 2.20 Previous work

<u>Page 18</u>. This section should note that seawalls and groins have been ineffective in controlling erosion, and probably cause some erosion. Groins and jetties block the drift of sand, 2/ whereas seawalls and similar structures accelerate erosion by vectoring wave forces downward, thus carrying away sand and leaving a channel into which the structures themselves may eventually fall. 2/3/

#### 2.28 <u>Erosional rates</u>

<u>Page 22</u>. Is the figure of 158,000 cubic yards the average <u>annual</u> erosion rate?

#### 2.30 Local conditions

Page 23. The statement should describe what is meant by ...partially restoring the problem beach."

#### 2.31 Fishes

Page 29. The statement should include an in-depth description of recreational and commercial fishing activities within the area. Fishing piers and reefs within the project area should be identified. Plans proposed to minimize damages to fish from pumping, dredging, and filling activities should be described. A survey of recreational fishing activities in the project area is presented by Moe (1970). 4/

#### 2.32 and 2.33 Invertebrates

Page 29. A description and delineation of reefs and reef rocks should be presented.

#### 2.39 Vegetation

Page 31. Turtle grass (Thalassia) beds are common on the bottom immediately south of the project area and play a major

role in the nearshore sedimentary regime, yet there is no mention of the presence or absence of <u>Thalassia</u> in the project area.

- 3.00 Environmental impact of the proposed action
- 3.01 Public use

<u>Page 32</u>. Mention should be made of the public access aspects subsequent to the beach replenishment. This was a problem during the early negotiation stages, and the history and solution of this problem should be included to preclude the problem being brought up again.

#### 3.02 Turbidity and sedimentation

Page 32. Whereas investigations indicated that reef communities in the vicinity of the project are deficient in numbers and kinds of organisms, the statement might also consider that project activities could severely diminish the recovery capabilities of these communities. Descriptions of the monitoring procedures and the dredging and pumping methods should be included.

#### 3.03 Benthic invertebrates

Page 33. References should be given for those studies or authorities supporting the conclusion that repopulation "...will occur soon after project completion." Bottom sediments in borrow pits offshore of Pinefalls County (Florida West Coast) were extremely soft and silty and virtually devoid of macro-invertebrates soon after project completion. 5/

#### 3.06 Sand fill

<u>Page 35</u>. The median diameters of sediment particles in samples taken at 30-ft. contour should be included. A description of sedimentary characteristics at the 40- and 60-ft. depths also should be included, since these are the depths from which sand is to be borrowed."

There is no indication of the depth of the excavation that will remain on the sea floor after the offshore borrow pits are abandoned. Modification of the sea floor will affect the local wave regime, yet there is no mention in the statement of possible shoreline effects from the focusing

of wave action or the modification of longshore drift patterns due to this modification of the local bottom topography.

#### 5.05 Other project material

<u>Page 37</u>. This section should identify any existing supplemental sources of sand that could be obtained from maintenance dredging or other similar activities within the project area.

Thank you for giving us the opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving a copy of the final statement.

Sincerely,

Sidney R. Galler

Deputy Assistant Secretary for Environmental Affairs

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#### Literature Cited

- U.S. Army Engineer District, Jacksonville, Florida. 1974.
   Draft Environmental Impact Statement, Beach Erosion Control Project, Duval County, Florida.
- Beach restoration: an exercise in futility. 1974. ENFO Newsletter, Environmental Information Center of the Florida Conservation Foundation Inc. Winter Park Florida. 16 p.
  - Slaughter, T. H. 1967. Beach diminution and bottom scour in front of vertical protective structures in the Maryland Chesapeake Bay. Shore and Beach, October, 1967.
     p.
    - 4. Moe, M. 1970. Florida's fishing grounds. Great Outdoors Publishing Company, St. Petersburg. 80 p.
    - Personal communication, Dr. John R. Hall, Fishery Biologist, National Marine Fisheries Service, Division of Environmental Assessment, P. O. Box 4218, Panama City, Florida.



# DEPARTMENT OF TRANSPORTATION UNITED STATES COAST GUARD

Address reply to:
COMMANDER (m)
Seventh Coast Guard District
Room 1012 Federal Building
51 SW. 1st Avenue
Miami, Fla. 33130

5922/19 28 August 1974

James L. Garland Chief, Engineering Division Jacksonville District Corps of Engineers P. O. Box 4970 Jacksonville, Florida

Subj: Draft Environmental Impact Statement on South Dade Conveyance Canals and East Coast Backpumping, Central and South Florida Project

Dear Sir:

As requested in your letter of 17 July 1974, the subject HIS has been reviewed by this office and no conflicts within Coast Guard mission areas were noted.

Thank you for this opportunity to register our comments.

Sincerely,

Captain, U. S. Codst Guard Chief, Marine Safety Division

By direction of the District Commander



## United States Department of the Interior

#### OFFICE OF THE SECRETARY

Southeast Region / 148 Cain St., N.E. / Atlanta, Ga. 30303

ER-74/957

September 24, 1974

District Engineer U.S. Army Corps of Engineers Post Office Box 4970 Jacksonville, Florida 32201

Dear Sir:

As requested in your July 19, 1974, letter to the Assistant Secretary, Program Policy, we have reviewed the draft environmental statement for the proposed Beach Erosion Control Project, Dade County, Florida, for its effects on national park areas and historic sites, hydrology, geology, mineral, and fish and wildlife resources.

We offer the following specific comments for your consideration:

#### Page 11, section 2.08

This section indicates that Golden Beach is a bathing beach for residents of Golden Beach only. If the area is publicly owned, it should not be restricted to Golden Beach residents. The presence of groins and seawalls mentioned in Section 2.10, Public Access, effectively preventing public use of the beaches, should also be taken into account in assessing the public benefit from the proposed project.

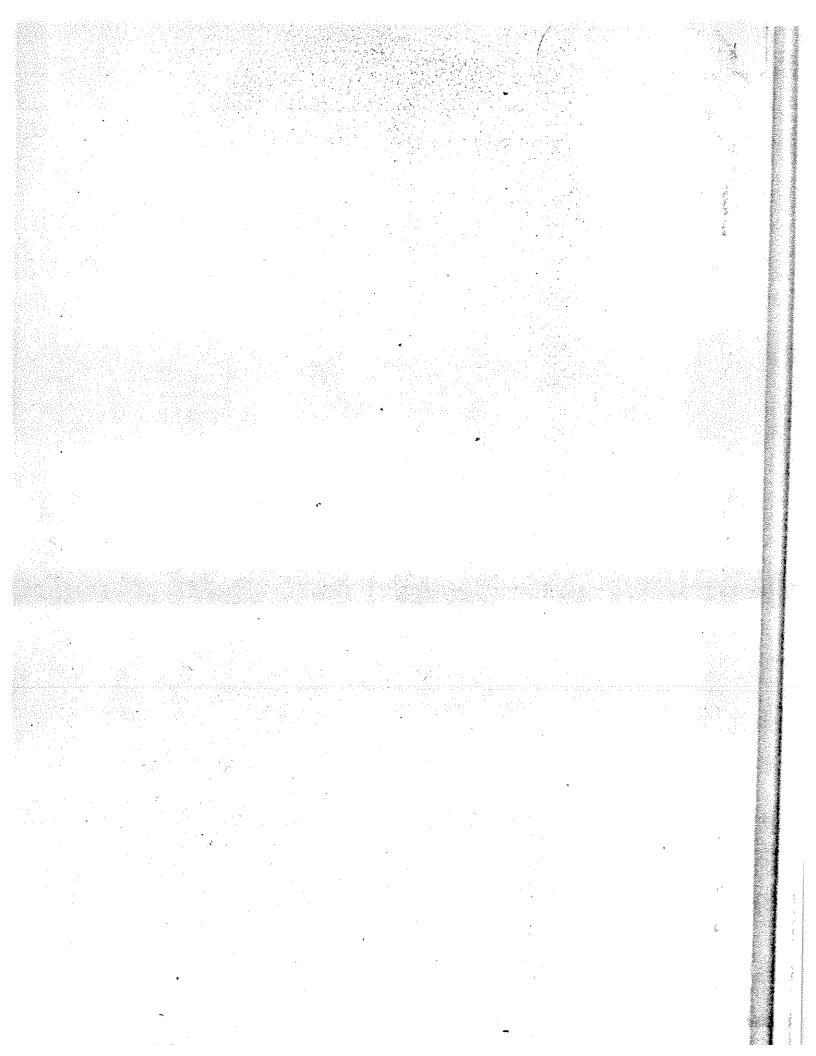
#### Page 30, section 2.36

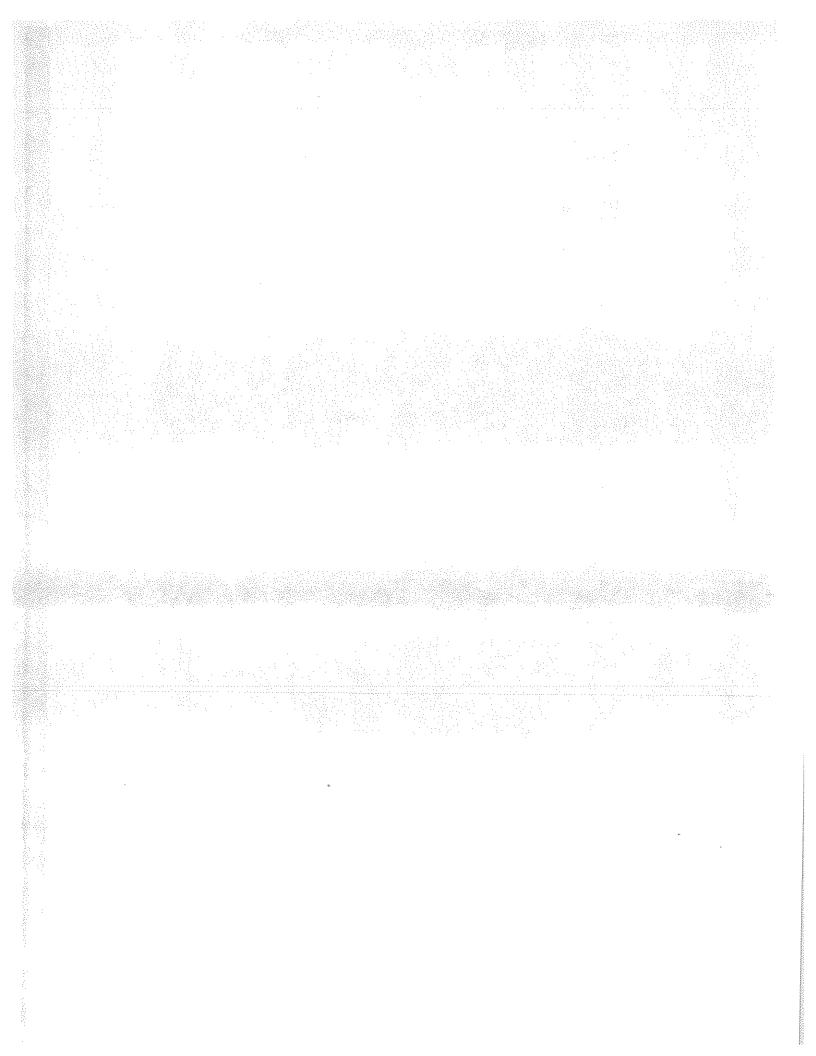
The statement discusses a reef survey made by scuba divers in the Miami Beach outer reef area, and compares the data obtained to an area near Fowey Rocks. We presume that Station 6 of Table 1-2 corresponds to the Fowey Rocks station. The decreasing numbers of organisms and species diversity from north to south within the

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study area, reported in Sections 2.35 and 2.36, may be correlated with siltation from dredging in Government Cut, as described in Appendix 1, under the Reef Survey heading. Therefore, Section 3.02, <u>Turbidity and Sedimentation</u>, which states that "... reef communities in the general vicinity of the project are deficient in numbers and kinds of organisms found in reef ecosystems north of the project area," appears to be justifying additional impact on stressed reef areas because of the reduced animal populations and diversity, when this reduction may be the result of ongoing dredging activities in the vicinity. The statement should discuss further the cumulative effect of prior environmental modifications, and the proposed work, upon the stressed reef areas.

#### Page 32, section 3.02

The statement would be improved by mention of whether the material to be dredged is polluted and, if so, a discussion of the effects of this condition should be included.

#### Page 33, section 3.03

The report assumes reestablishment of marine organisms through natural proliferations after adverse environmental effects have worn off. Previous reef studies carried out indicate this is not the case; reefs in weakened condition do not provide basis for regenerating organisms but gradually worsen and die.

#### Page 34, section 3.05

We note that the Florida Historic Preservation Officer will be consulted. A copy of his comments should be included in the final report. The National Register is in an early state of development and under Executive Order 11593 and the Procedures for Compliance with the Historic Preservation Act of 1966 as published in the Federal Register of January 25, 1974, requires the Federal agency to identify and to place in nomination to the National Register those sites that may be affected by the projects. It is incumbent upon the Corps to carry out such a study. In addition, the Corps should check with the Florida Historic Preservation Officer regarding any places that he may have in the process of nomination to the National Register of Historic Places.

For additional information refer to the booklet entitled, "Preparation of Environmental Statements: Guidelines for Discussion of Cultural (Historic, Archeological, Architectural) Resources," sent

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Sincerely yours,

(Migs Dune Whelan)
Special Assistant to the Secretary
Southeast Region

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#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION IV

1421 PEACHTREE ST., N. E. ATLANTA, GEORGIA 30309

September 3, 1974

Mr. James L. Garland Chief, Engineering Division Jacksonville District Corps of Engineers P.O. Box 4970 Jacksonville, Florida 32201 VI.
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ACTION TAKEN

Dear Mr. Garland:

We have reviewed the Draft Environmental Impact Statement for the Beach Erosion Control and Hurricane Protection Project in Dade County, . Florida (between Government Cut and Bakers Haulover Inlet) and are concerned about some of the environmental consequences of the proposed action. Furthermore, we do not believe the benefits of the project will outweigh the environmental damage, and urge that further consideration be given to the suggested alternatives.

We are especially concerned about the effect that 10.5 miles of dredging will have on the unique reef system of the area, and find a need for additional information on this aspect of the project in order to assess fully the environmental impact.

The Statement notes that the reef system is under extreme stress; however, it is indicated that because of this condition, the dredging of a 3,000-foot-wide strip beginning at 6,000 feet offshore, is justified.

We believe, on the contrary, that such action will degrade or destroy what reef life is left, and that every effort should be made to protect it. This Office, in its exhaustive "Ocean Outfalls and Other Methods of Treated Wastewater Disposal in Southeast Florida" (March 19, 1974) also presents documentation that the reefs are underextreme stress and went to great lengths to preserve them. In view of our findings in this report, we do not look favorably on a short-term project that would have such serious long-term effects on the biota.

As to specific comments on the Statement, we offer the following:

l. There are several deficiencies in the reports on visual locations at five locations along the reef. First, we believe that

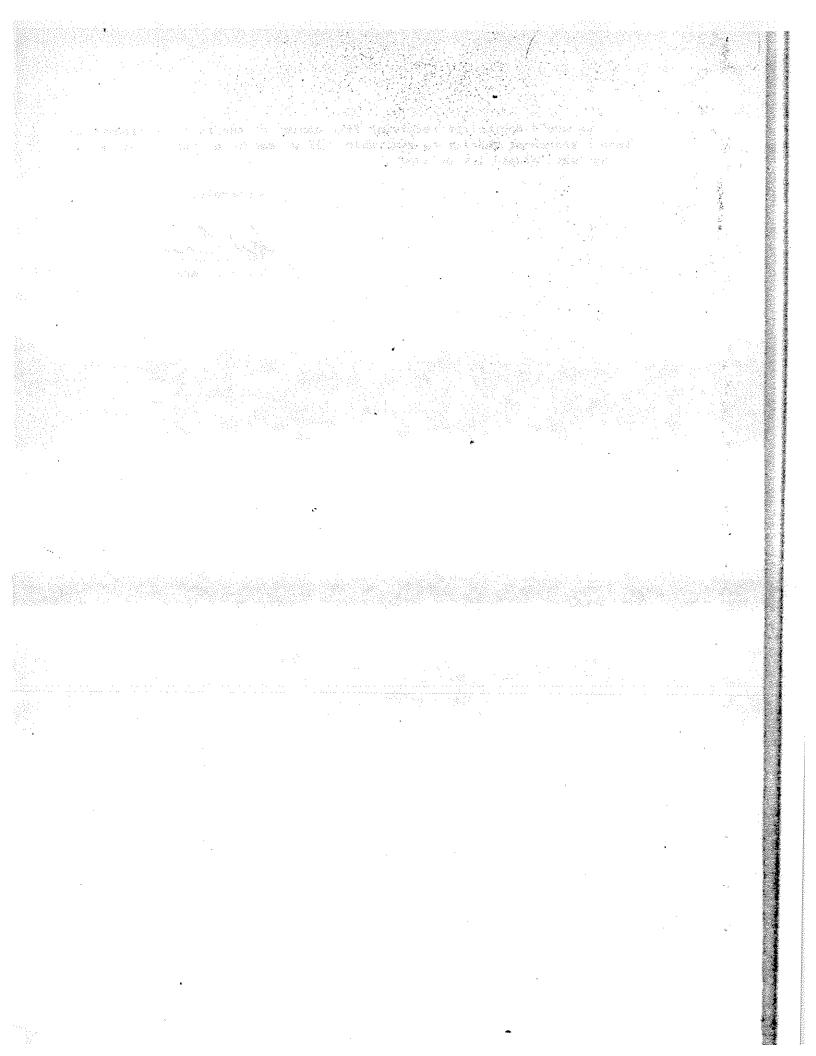
limiting the observations to only five stations is inadequate for an accurate description of the reef. It also would be helpful to know:
(a) who did the observing and their qualifications for assessing its state of being, and (b) the location of the reef(s) in relation to the proposed dredging area.

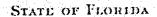
- 2. Since the reef at Station 1, which is about one mile from Government Cut, showed evidence of stress from dredging in Government Cut (page 1-5), we believe that additional studies should be made to determine the area of influence of the dredging, and the minimum distance from the reef that dredging should be done.
- 3. Appendix 1 states that qualitative and quantitative information on regional distribution of benthic organisms is useful in selecting operational sites that would cause minimum environmental damage. We suggest that a five-mile stretch without a station (page 1) would not give much information on the bottom within that area.
- 4. Identification of the macroinvertebrates collected on February 8, 1974 and given in Table 1-1 leaves much to be desired. Identification to the generic or specific level, especially those organisms making up the larger part of the community (i.e. polychaetes and molluscs), would add much to the discussion of density and diversity.
- 5. It is stated (page 33) that the benthic community will return to normal following completion of the project. However, no mention is made of how long this will be. We recommend expansion of this topic in the final statement, preferably with reference to studies that have been conducted and documented.
- 6. Information should be provided on the probable makeup of the surface substrate in the borrow area once sedimentation has ceased. If dredging is to be continued every two to three years, the inevitable result will probably be destruction of life in the coral reef, and the organisms in the borrow area will be limited to those capable of living in silt and not adversely affected by turbidity. Fishing in this area would suffer as a result of a decrease in fish food.
- 7. We note that the benefit-cost ratio for the 0.85 segment of the project south of and adjacent to Bakers Haulover Inlet (EIS, November 1972) was 1.1 to 1.0 at 5 3/8 percent. However, the benefit-cost ratio of the present project is 1.7 to 1.0 at an unknown interest rate. It would be helpful to know how this is made up, and we recommend that the final statement include this information.

We would appreciate receiving five copies of the final environmental impact statement when it is available. If we can be of further assistance in any way, please let us know.

Sincerely,

Jack E. Kavan Regional Administrator







### Bepartment of Administration

#### Division of State Planning

660 Apalachee Parkway - IBM Building

Reubin O'D. Askew

Earl M. Starnes

TALLAHASSEE 32304 (904) 488-2371

L. K. Ireland, Je.

September 19, 1974

James L. Garland
Chief, Engineering Division
Jacksonville Division, Corps of Engineers
P. O. Box 4970
Jacksonville, Florida 32201

一个年龄还是美国安全的 的第三人称形式人

Dear Mr. Garland:

Functioning as the state planning and development clearinghouse comtemplated in U. S. Office of Management and Budget Circular A-95, we have reviewed the following draft environmental impact statement:

Beach Erosion Control and Hurricane Protection Project, Dade County, Florida. SAI: 75-0113E

During our review we referred the environmental impact statement to the following agencies, which we identified as interested: Department of Agriculture and Consumer Services, Department of State, Department of Health and Rehabilitative Services, Department of Natural Resources, Department of Transportation, Department of Community Affairs, Board of Trustees of the Internal Improvement Trust Fund, Department of Pollution Control, Game and Fresh Water Fish Commission. In addition, statements were forwarded to the Environmental Information Center and the South Florida Regional Planning Council for further distribution. Agencies were requested to review the statement and comment on possible effects that actions contemplated could have on matters of their concern. Letters of comment on the statement are enclosed from the Department of Transportation, South Florida Regional Planning Council, Department of Community Affairs, Environmental Information Center, Department of Pollution Control, and the Department of Health and Rehabilitative Services. The Department of Agriculture and Consumer Services reported "no adverse comments" by telephone.

State agency comments and the results of meetings between various agencies can be summarized as follows:

(1) The enormous public cost of the project should serve to justify additional public beach access.

- (2) The dredge site is not adequately defined as to size, shape, location, etc., and should be so defined in the final environmental impact statement.
- (3) Adequate environmental assessment of potential long-range effects of initial and recurring offshore dredging has not been made. In particular, the effect of increased turbidity on reefs to the north and south should be carefully evaluated.
- (4) Projected resident and tourist populations are not supported and may be discrepant in light of current economic conditions.
- (5) Proposed borrow areas are in -40 to -60 feet of water. In section 3.06 the deepest sample was taken to -30 feet. There is no evidence to indicate that the grain sizes of the proposed borrow area would be suitable to the sub-aerial and breaker zone of the new beach.
- (6) The fact that reef communities at the work area are different in numbers and kinds of organisms than those found in reef ecosystems north of the project area, does not mean the impact of adverse effects would be reduced. If anything they are accentuated since the community is smaller but still subject to the same stress.
- (7) Median diameters do not give an adequate representation of the sediment. Grain size distribution should be shown.
- (8) There is no indication that the sand in the proposed borrow areas is suitable for beach fill. Data for present beach sand (taken in 1964) and a sample from -18 feet do not constitute data for the borrow areas.
- (9) Grain size distribution and data for all samples plus data and grain size distributions for samples taken from proposed borrow areas should be included in the final Environmental Impact Statement. Also, the number of sampling stations should be increased.
- (10) Turbidity and siltation can kill many reef organisms, especially sessile organisms. More information is needed on suspended materials, duration of dredge operation, and transport of suspended materials out of dredge and fill areas and amount of sedimentation.
- (11) The project will only enhance the value of the area in the short-term as artificial maintenance will be necessary in the long-term. On the other hand, the repopulation time for many of the corals would be long-term as they need a hard surface on which to attach themselves and these surfaces would be silt-ladden as a result of dredging.
- (12) The following alternative should be evaluated: reinforce seawall where needed, construct limited public beaches by limited pumping around areas of presently good groin fields, and remove groins from areas not designated public beach to maximize littoral drift.

(13) The benefit-cost ratio should be substantiated and as a minimum should include the costs of long term environmental degradation, recurring maintenance dredging and restoration, and possible reduces benefits due to recent economic trends.

In accordance with the Council on Environmental Quality guidelines concerning statements on proposed federal actions affecting the environment as required by the National Environmental Policy Act of 1959, and U. S. Office of Management and Budget Circular A-95, this letter, with attachments, should be appended to the final environmental impact statement on this project. Comments regarding this statement and project contained herein or attached hereto should be addressed in the statement.

We request that you forward us copies of the final environmental impact statement prepared on this project.

Earl M. Starnes

Director

Division of State Planning

Enclosures EMS/Lms

cc: Mr. John Bethea

Mr. Charles Blair

Mr. O. J. Keller

Mr. Jay Landers

Mr. John Lisle

Mr. William Partington

Mr. Jim Dennis

Mr. Harmon Shields

Mr. Don Spicer

Mr. H. E. Wallace

Mr. Robert Williams

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#### STATE OF FLORIDA DEPARTMENT OF POLLUTION CONTROL

25G2 EXECUTIVE CENTER CIRCLE, EAST MONTGOMERY BUILDING, TALLAHASSEE, FLORIDA 32301

August 27, 1974

RE:

W. D. FREDERICK, JR. CHAIRHAN

SAI: ( 75-0113E )

Dade County \_\_\_\_

иот м(5 го 1974

Beach Erosion Control and Hurricane Protection Project

PETER P. BALJET ARECUTIVE DIRECTOR

> Mr. E. E. Maroney Bureau of Intergovernmental

> > Relations Department of Administration Division of State Planning 660 Apalachee Parkway Tallahassee, Florida 32304

Dear Mr. Maroney:

The Department of Pollution Control has reviewed the above mention "draft environmental statement". The Department is concerned with the degradation of water quality during the construction phase.

Turbidity will be difficult to control at the start of the project due to the lack of sufficient material at the disposal site to construct the necessary berms, dikes, etc., to provide retention of the liquid portion of the hydraulic dredge discharge and settling out of suspended fine sediments.

Turbidity at the dredge site, though not as great as at the spoil site, will be more difficult to control as conventional methods of control, i.e. diapers, are not practical in the water depths at the proposed dredge sites. Other means of controlling turbidity at the dredge sites may be necessary.

The reefs north of the project, in addition to those in the immediate vicinity, will be effected by turbidity and sedimentation produced by the dredging because of the predominance of north currents.

Sincerely,

Humilton S. Oven f. Hamilton S. Oven, Jr., P.E.

HSOJr/lbm cc: Dick Tash, SE Region Mark D. Hollis John R. Middlemas

BOARD MEMBER

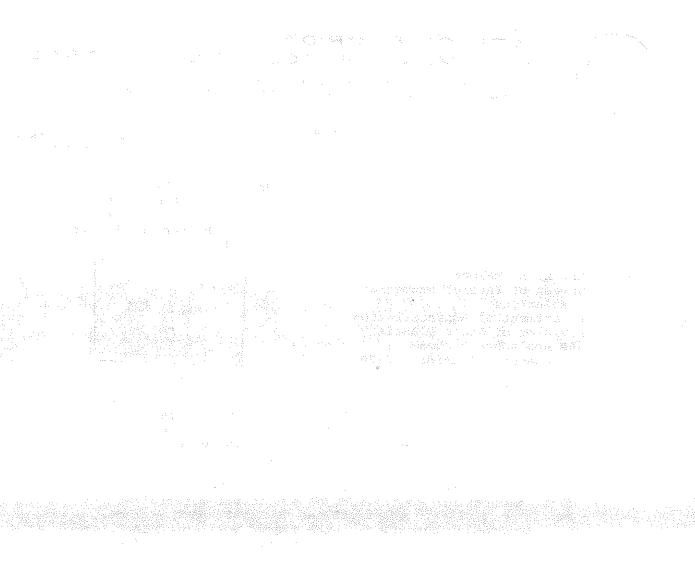
Alice C. Wainwright

Y. E. Hall BOARD MEMBER

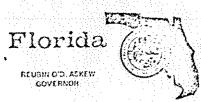
BOARD MEMBER

BOARD MEMBER

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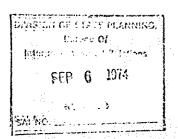
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#### Department of Transportation

Haydon Burus Building, 605 Suwannes Street, Tailahassee, Flunda 32304, Telephone (504) 488 6772 WALTER L. REVELL SEGRETARY

September 4, 1974



Mr. E. E. Maroney Chief, Bureau of Intergovernmental Relations Division of State Planning 660 Apalachee Parkway Tallahassee, Florida 32304

Dear Mr. Maroney:

Subject: SAI 75-0113E

Dade County Beach Erosion Control Project

We have reviewed the transportation aspects of the subject project and have no adverse comments.

We appreciate the opportunity to comment at this early date.

Yours very truly,

RAY G. L'AMOREAUX, DIRECTOR

DIVISION OF PLANNING AND PROGRAMMING

W. N. Lofroos, V.E. Chief, Bureau of Planning

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#### STATE OF FLORIDA

# DEPARTMENT OF COMMUN

JULTY AFFAIRS

LIN O'D. ASKEW, GOVERNOR-

EDWARD J. TROMBETTA: SECRÉTARY
TRAINING AND PROFESSIONAL DEVELOPMENT

RGENCY GOVERNMENT TECHNICAL ASSISTANCE
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ECONOMIC OPPORTUNITY

VETERANS AFFAIRS

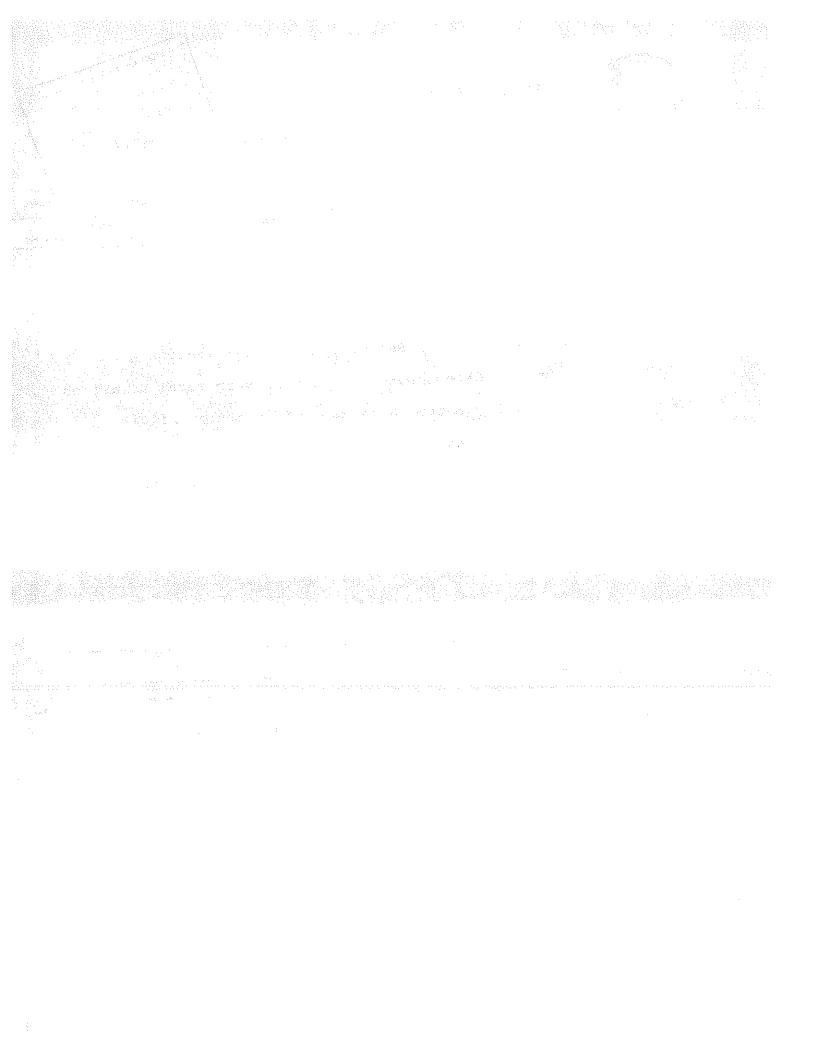
	PRIOR NOTIFICATION AND REVIEW SYSTEM
MEMO	RANDUM
TO:	L. K. Ireland, Jr., Secretary of Administration
· NTTN:	Ed Maroney, Chief, Bureau of Intergovernmental Relations
FROM:	Edward J. Trombetta Caracana
BY:	RYXCHETIESXEREPREED William J. Tait, Jr., Acting Director
SUBJECT:	Notification of Intent to Apply for Federal Funds
DATE:	August 8, 1974
RE:	REF. NO. (DCA)SPDC (SAI)75-0113E
	Title: Environmental Impact Statement on Dade County,
	Florida Beach Erosion Control Project
	Applicant: Dade County, Florida
***	

The project identified above has been reviewed in accordance with O.M.B. Circular A-95. Action recommended:

' 🐼 =	The project is consistent with the goals and objectives of the Department of Community Affairs. Favorable action recommended.
	Substantive comments have been received and are summarized in the attached.
-	

- Conference with applicant is requested.
- The project is not consistent with the goals and objectives of the Department of Community Affairs. Approval is not recommended for reasons described in the attached.

Attachment(s)





# State of FlorIda Department of Community Affairs DIVISION OF TECHNICAL ASSISTANCE Reubin O'D. Askew, Governor Edward J. Trombetta, Secretary

#### PRIOR NOTIFICATION AND REVIEW SYSTEM

DATE:	August 7, 1974
FROM:	Harry Schmertmann
	Chief, Bureau of Local Assistance
TO:	William J. Tait, Jr., Acting Director
SUBJ:	Review of Application for Federal Funds
RE:	REF. NO: (DCA)SPDC (SAI)75-0113E
	Title: Environmental Impact Statement on Dade County,
* .	Florida Beach Erosion Control Project .
	Applicant: Dade County, Florida
Reviewe	r's Name & Title James H. Saves, CDS II
Reviewe	r's Comments (Attach additional sheets if necessary):

It is our understanding that Miami Beach favors the project, therefore, no adverse comments.

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#### STATE OF FLORIDA

#### DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

Prior Notification and Review System O. J. KELLER Entrocit S. Röberts 7 Secretary Date: August 1, 1974 **MEMORANDUM** REF. NO: DHRS\_ SPDC (SAI) 75-0113E TITLE Florida Reach Erosion Control Project Department of the Army APPLICANT\_ TO: Kenneth Ireland, Secretary Department of Administration Attn: Don L. Spicer, Chief O. J. KELLER FROM: Emmett S. Roherts Secretary Department of Health and Rehabilitative Services By: Division of Planning and Evaluation NOTIFICATION OF INTENT TO APPLY FOR FEDERAL FUNDS SUBJ: The project identified above has been reviewed in accordance with O.M.B. Circular A-95. Action recommended: The project is consistent with the goals and objectives of the Department of Health and Rehabilitative Services. Favorable action is recommended. Substantive comments have been received and are summarized in the attached. Conference with applicant is requested. The project is not consistent with the goals and objectives of the Department of Health and Rehabilitative Services. Approval is not recommended for reasons described in the attached. alsa a grand participation Attachment (s) Interagrees at 184 con AIG 20 18,4 SAL INC.

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Mr. James L. Garland Chief, Engineering Division Jacksonville District, Corps of Engineers

P. O. Box 4970 Jacksonville, Florida

31 August 1974

Ref: Draft - Environmental Impact Statement Dade County, Florida. Beach Erosion Control Project and Murricane Protection

Dear Mr. Garland:

In response to your letter of 19 July 1974, we have, on behalf of the Tropical Audubon Society reviewed the above mentioned proposal. It is our opinion that numerous unanswered questions and poorly or completely undefined areas of scientific analysis need further examination in the compilation of any final environmental impact statement. Two general aspects are in need of further up-to-date input:

(a) scientific, (b) economic.

The draft impact statement, in general, is based upon out-dated studies. It is particularly noted that the sand and current study utilized was completed in 1936, (ref. paragraph 2.18). Since then, major modification of the beach area has taken place. Not only has beach rejuvenation been conducted, but the offshore region has changed - i.e. the 12 foot contour line has receded 282 feet (ref. paragraph 2.29) despite or possibly because of groin construction and emplacement. Additional encroachment of the beach area by hotel and motel construction has further reduced or removed entirely the potential source of natural sediment supply which previously existed.

The offshere disposal of sewage via pipeline has been documented as being a major pollution hazard to bathers as well as benthonic and pelagic cryanisms. No mention of these reports is made, either as a past problem or as to the potential effects which may occur as a result of beach rejuvenation.

There has been no relevant research of previous beach rejuvenation efforts during the past nourishment periods. Was the beach sand carried offshore, down the coast and further south to Key Biscayne?

(A) 100% Average

Mr. James L. Garland

31 August 1974

Page 2

Essentially, what has happened to it? What may happen to the pumped up sand after this proposed operation is completed?

What will be done with the existing, deteriorated bulkheads? Will they be replaced, removed or simply covered: What about the groins, water pipes, sewage disposal lines, swimming pool drains? - will they be relocated or removed?

Will the newly placed "dune" be stabilized with vegetation?

What about the offshore corals? Will they be totally disregarded and killed?

There also exist numerous economic and legal questions. For instance, how was the cost-benefit ratio determined? The non-specific nature of the data needs clarification. What was the basis of computation and to whom do the "benefits" apply?

The public access to the beach is hardly access. No new access areas are planned and it is obvious that the old access areas, including public property, does not include sufficient parking areas.

Maya local laws been strengthened as to encroachment of beach areas by construction? Do recent state decisions locating setcack lines further inland have legal effect on artifically created beaches or do old standards apply?

Obviously, the draft statement does not reflect any of these questions. Therefore, we of the Tropical Audubon Society request a public hearing to clarify these points and to ascertain whether or not this project is really in the best interest of all citizens of Miami Beach and Dade County. This hearing should be held locally.

Sincerely,

Peter a Gung Peter A. Quincy, President

Oberglas C. Pasley . 9.

Douglas C. Pasley, Jr., Director

FAQ, DCF:mp

CC: Mr. Hal Scott

Mr. Charles H. Callison